

## DEFENDANTS' MOTION TO ENLARGE TIME FOR SERVING ANSWERS TO WRITTEN DISCOVERY PURSUANT TO FEDERAL RULE 6

Defendants Ronald Snyder and Keoke Craft respectfully submit the following

Motion to Enlarge Time for Serving Answers to Written Discovery Pursuant to Federal Rule 6.

- 1. On June 15, 2006 plaintiff Jennifer Ann Fedorek filed this pro se civil rights action.
- In her complaint, plaintiff alleges violations of the Eighth and Fourteenth
   Amendments to the United States Constitution, arising out of events that occurred on May 14,
   2005 at the Venango County Prison, located in Franklin, Venango County, Pennsylvania.
- 3. On May 18, 2006, plaintiff served her first set of interrogatories and requests for production of documents by mail.

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- Federal Rule 33 provides an answering party 30 days to serve responses to 4. written discovery. Federal Rule 6 provides an answering party with 3 additional days to respond when the discovery was served in a manner prescribed by Federal Rule 5(b)(2)(B), which includes service by mail.
- 5. Defendants' time for responding to plaintiff's written discovery will expire on May 20, 2006.
- 6. Pursuant to Federal Rule 6, defendants hereby move this Court for an extension of 20 days to respond to plaintiff's written discovery.
- 7. Defendants' counsel is currently out of the office on vacation and he will not be returning until June 26.
- 8. Defendants' counsel will need to work with his clients to prepare answers to the interrogatories and responses to the requests for production.
- 9. Defendants would ask the Court to enlarge the time for responding to plaintiff's written discovery by 20 days.

WHEREFORE, defendants respectfully request that their time for responding to plaintiff's written discovery be enlarged by 20 days.

Respectfully submitted,

/s/ James T. Marnen

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